

EXHIBIT B – EXCERPT FROM JON BECK DEPOSITION

LARADA SCIENCES

VS

PEDIATRIC HAIR SOLUTIONS

Case No. 2:18-cv-00551-RJS-PMW



JON E. BECK

May 27, 2022

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1 MR. GRIBBIN: All right. Thank you.

2 THE REPORTER: We'll be off record.

3 (Whereupon a lunch break was taken.)

4 THE VIDEOGRAPHER: We're back on the record.

5 The time is 1:31. Counsel may proceed.

6 BY MR. GRIBBIN:

7 Q. Welcome back, Mr. Beck.

8 A. Thank you.

9 Q. Did you speak with your counsel over break
10 about the substance of your testimony?

11 A. No.

12 Q. Okay. We left off talking about Exhibit 1,
13 which is your expert report. Specifically, we're
14 talking about the four categories of trade secrets
15 you've identified in pages 7 through 10. Are you with
16 me?

17 A. Yes.

18 Q. So I wanted to start off with a broader
19 question about these categories. How did you choose
20 what these four categories are?

21 A. Well, I -- I think with my own area of
22 expertise and understanding, again, there might be other
23 categories that we -- we mentioned earlier, these are
24 the things that can be categorized and included as, in
25 my opinion, trade secrets involved in the entire device

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1 and its -- its executed performance.

2 And so, of course, there are many other
3 categories of -- of, who knows, you know, collections of
4 components or subassemblies or functions that have to do
5 with the LouseBuster. But they're not to qualify for
6 trade secrets. And in my opinion, these are, you know,
7 four areas of, you know, performance, deliverables, you
8 know, technology, and whatever you -- whatever you want
9 to use as a heading, that I deemed as categories that
10 are trade secrets.

11 **Q. But how did you alight on just these four**
12 **categories?**

13 A. I -- I guess you're furthering the question
14 and I don't understand. I think if I can just refer to
15 the categories, individually. Again, you know, the
16 output parameters. So the temperature and delivery
17 controls. So what the -- what the LouseBuster delivers
18 to the kill the lice is, in my opinion, done through
19 methods that qualify as a trade secret.

20 And my second category that came to mind as
21 I thought this over and reviewed, was the method by
22 which it performed an actual delousing treatment by
23 pairing a nozzle with the rest of the system, as a
24 second category or a second item that would qualify as a
25 trade secret, in my opinion.

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REPORTER'S CERTIFICATE

STATE OF UTAH)
)
COUNTY OF UTAH)

I, DEIRDRE RAND, a Certified Court Reporter and
Registered Professional Reporter, hereby certify:

THAT the foregoing proceedings were taken before
me at the time therein set forth, with all parties
appearing via videoconference from their respective
locations, at which time the witness was placed under
oath to tell the truth, the whole truth, and nothing but
the truth; that the proceedings were taken down by me in
shorthand and thereafter my notes were transcribed
through computer-aided transcription; and the foregoing
transcript constitutes a full, true, and accurate record
of such testimony adduced and oral proceedings had, and
of the whole thereof which were audible and intelligible
through the videoconference connection.

I further certify that I am not a relative or
employee of any attorney of the parties, nor do I have a
financial interest in the action.

I have subscribed my name on this 21st day of
June, 2022.


DEIRDRE RAND, RPR, CSR, CCR